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Attorneys for Plaintiff, Sergio L. Ramirez

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SERGIO L. RAMIREZ, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

TRANS UNION, LLC,

Defendant.

Case No. 12 cv-00632-JSC

Class Action

PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE TESTIMONY AND
DOCUMENTS UNDER SEAL

1 Plaintiff hereby moves for an administrative order pursuant to L.R. 79-5 permitting certain
2 information to be filed under seal in connection with Plaintiff's Motion to Certify Class.

3 Plaintiff makes this motion because Defendant Trans Union, LLC and third party Accuity
4 Inc. have designated certain information, identified in Plaintiff's declaration attached hereto, as
5 "confidential" or "highly confidential" pursuant to the protective order in place in this matter.
6 Dkt. No. 37-1. The existence of a stipulated protective order is, however, not sufficient to
7 establish that a document is sealable. L.R. 79-5(d)(1)(A); *Pintos v. Pac. Creditors Ass'n*, 605
8 F.3d 665, 678-79 (9th Cir. 2009). It is Plaintiff's position that the documents he has identified
9 and used in support of his Motion to Certify Class do not meet this heightened standard, and
10 should be filed in the public record. Plaintiff gave Defendant and Accuity, Inc. advance notice of
11 the documents and testimony he seeks to use. Defendant removed its confidentiality designations
12 from two documents, but maintains that the remainder of the material identified herein must be
13 filed under seal. Accuity, Inc. maintains that the material marked confidential must be filed under
14 seal.

15 Plaintiff therefore makes this administrative motion pursuant to L.R. 79-5, and lodges
16 copies of the information marked as confidential and used in Plaintiff's Motion with the Court.

17 Respectfully Submitted,

18 Dated: March 14, 2014

FRANCIS & MAILMAN, P.C.

19 By /s/ John Soumilas
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